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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re: Alexandre J. Dacosta and Vivianne C. Antunes, Debtors.	Chapter 13 Case No. 22-18303-RG Hearing Date: December 7, 2022 at 8:30 a.m. Judge: Rosemary Gambardella
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LIMITED OBJECTION TO PLAN CONFIRMATION

JPMorgan Chase Bank, National Association ("Secured Creditor"), by its counsel, McCalla Raymer Leibert Pierce, LLC, states the following grounds as and for an Objection to Confirmation of Alexandre J. Dacosta and Vivianne C. Antunes' (collectively the "Debtors") Chapter 13 plan (the "Plan"):

1. Secured Creditor holds a perfected mortgage on Debtors' real property; the property known as 78 -80 Columbia Ave, Kearny, New Jersey 07032 (the "Property"). On October 1, 2012, Debtors borrowed \$296,000.00 in exchange for a mortgage on the Property (the "Mortgage"). Secured Creditor anticipates filing a proof of claim with arrears of \$317.78 on a total claim of \$183,192.39.

2. Debtors' proposed Chapter 13 Plan is silent as to the treatment of the Secured Creditor despite acknowledging Secured Creditor's lien in their Schedules. Absent a

modification addressing the treatment of Secured Creditor, the proposed Plan cannot be confirmed.

3. Secured Creditor objects to any proposed plan by Debtors that fails to provide a feasible independent plan of reorganization.

WHEREFORE, Secured Creditor respectfully requests that the Court deny confirmation of the Debtors' Chapter 13 Plan for the reasons set forth above and for other relief as the Court may deem just and proper.

Dated: November 29, 2022

McCalla Raymer Leibert Pierce, LLC
Attorneys for JPMorgan Chase Bank, National
Association
/s/Phillip Raymond

By: Phillip Raymond